

2024

COMPLAINT HANDLING POLICY



Mohammed Zakaria
TIZAA RURAL BANK PLC
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COMPLAINT HANDLING POLICY

TRB We Really Care	Complain handling policy
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1. FORWARD

Tizaa Rural Bank Plc (TRB) places great importance on maintaining good and transparent relationships with its stakeholders. The bank is committed to staying well-informed about potential sources of complaints and reaching out to dissatisfied individuals to find suitable solutions and continually improve its products, activities, and services. This aligns with TRB's business principles, which emphasize caring for customers and welcoming their feedback, while handling expressions of dissatisfaction fairly, consistently, and promptly.

This policy outlines the steps TRB takes to ensure an effective and transparent process for promptly addressing complaints. It provides clear, accurate, and up-to-date guidelines for handling complaints.

The policy covers the minimum measures that all operating units within TRB's scope should take and is based on the Bank of Ghana (BOG) consumer recourse mechanism guidelines 2017 and other consumer protection laws of the Republic of Ghana.

2. Scope

This policy applies to all activities, products and services of TRB.

3. Definitions

Definitions and abbreviations used in this document are written with a capital letter. If they are not explained here, refer to the TRB for their meanings.

Abbreviations	Meaning
BOG	Bank of Ghana
TRB	Tizaa Rural Bank
CRO	Complaint Resolution Officer
Definitions	
Consumer	An individual, a group or a firm that uses, has used, or
	may be contemplating using, any of the products or
	services provided by a financial service provider.
Complainant	A consumer, customer, or potential customer, or a
	duly authorised representative of a customer who
	presents a complaint to a financial service provider.
Complaint	Any expression of dissatisfaction specifically directed
	to TRB by an individual or a legal entity regarding the
	provision of banking service, or the actions of TRB is
	considered a complaint. If there is any uncertainty, the
	feedback should be treated as a complaint.
	Dissatisfaction may be communicated through various
	channels including Facebook, Twitter, Instagram,
	WhatsApp, telephone, email, by speaking with an
	officer, or by letter received by TRB. These
	expressions of dissatisfaction will be considered as
	complaints if they are made through an official TRB
	channel where TRB also communicates with
	individuals, such as an official response on the TRB
	Facebook page or WhatsApp

4. ORGANIZATION

4.1 Complaints management function

The bank has a complaints management function in place to investigate complaints at both the head office and branch levels. This function ensures the fair investigation of complaints and identifies and mitigates potential conflicts of interest. The board of directors delegates the responsibility of monitoring and responding to complaints to the senior management of the bank. The Marketing, Research, and Communication Manager is appointed as the complaint resolution officer (CRO). All written complaints will be directed to the appropriate functional area. The relevant personnel will draft responses to consumers and regulators, cross-copying the CRO. Generally, the CRO will keep a central file of complaints and responses unless stated differently in this document, and the board of directors will review new complaints and responses at quarterly board meetings. Senior management will determine if certain complaints must be brought to the attention of the board more often or if the response to the consumer and/or regulator should come from the board.

4.2 General principles for Complaints handling within TRB

- **4.2.1** Every Branch or unit should have one particular officer you can easily contact if you need to make a complaint.
 - **4.2.3** Each complaints handling procedure must at least:
 - Acknowledge receipt of every complaint filed by a complainant within two (2) days of receipt of the said complaint.
 - Give clarity on response times. In principle, the response time for reaching a decision should be a maximum of 5 working days and shall be considered part of the twenty (20) day resolution period
 - Include the possibility of an internal appeal

4.2.4 Complaints must be carefully recorded and reported. The collected data must be analyzed to recognize any patterns and take necessary action.

4.3 Register

Each branch or unit shall maintain adequate internal administration to register every complaint received appropriately. The register must clearly indicate at least the following:

- Complaint unique number
- Date & Time Received
- Date complaint occurred
- Channel Of complaint presentation
- Name of complainant
- Gender of complainant
- Ghana card No of complainant
- Age/DOB of Complainant
- Contact number of complainant
- Contact Address/GPS of the complainant
- Preferred method for receiving follow-up
- Product or service type the complaint refers to
- Account number of complainant
- Description of the complaint
- Desired outcome sought by the complainant
- Any supporting documentation
- Officer who received the complaint

4.4 Right to Complain to TRB

Before escalating a complaint, all consumers should first contact the branch or agency of TRB that provided the product or service in question, either at the location where the service was received or by using procedures bellow:

Have a Complaint?	Complaint process	Escalation Point
DISSATISFIE D WITH OUR SERVICE	Log your complaint to the Branch Managers –Verbally or in writing. The letter can be delivered in person or sent either via email or by normal mail). You can also log your complaint in the Box placed within the Banking Hall. The Manager will formally acknowledge receipt of the complaint within two (2) working days. Expect your complaint to be resolved within three (3) working days.	A
NOT HAPPY AFTER 5 DAYS	If you feel that the complaint has not been satisfactorily dealt with by the Branch Manager, you can then escalate to any of the following managers. • Marketing, Research, & Communication Manager, • Operations Manager • Risk and Compliance manager They will formally acknowledge receipt of your complaint within two (2) working days. Expect your	В

	complaint to be resolved within four (4) working days.	
STILL NOT HAPPY AFTER 11	 In the event that your complaint is not addressed by the; Operations Manager Marketing, Research, & Communication Manager, Risk and Compliance manager then you have the right to complain to the Chief Executive officer The CEO will formally acknowledge receipt of your complaint within two (2) working days. Expect your complaint to be resolved within seven (7) working days. 	C
STILL NOT SATISFIED AFTER 20	You may log a written complaint with the ARB APEX BANK- apex@arbapex.comi (+233)0302771738/2772129/2772034 or Bank of Ghana = complints.@bog.gov.gh (+233)302665005 If you are still not satisfied with the handling of your complaint.	D



Allow for a maximum period of 20 working days for a decision from ARB Apex bank or Bank of Ghana. You may seek legal advice if you are still not satisfied

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4.5 Internal follow-up of Complaints-handling

Both at the head office and branch level, complaints handling data shall be analysed continuously to identify and address any recurring or systemic problems, as well as potential legal and operational risks. This analysis shall be carried out through various methods, including:

- **4.5.1** Analysing the causes of individual complaints to identify common root causes for types of complaints.
- **4.5.2** Considering whether such underlying causes may also impact other processes or products, even those not directly mentioned;
 - **4.5.3** Correcting, where reasonable to do so, such root causes.

4.6 Reporting

• Internal:

Monthly, a report on the received complaints must be provided to the Manager- Marketing, Research, and Communication.

• External:

Quarterly, the Manager- Marketing, Research, and Communication must provide a report on the received complaints to BOG.

4.7 Role of the Compliance Department

The Compliance Manager is responsible for monitoring the operations of the complaints handling process as part of their general monitoring duties. They must consider complaints as a source of relevant information and carefully analyse complaints and complaints handling data.

5. PROCEDURES

5.1 Receiving of / Responding to Complaints

5.1.1 Complaints should be submitted free of charge and can be channeled through the following

- Verbally, in person
- Verbally, by telephone
- In writing, in person
- In writing by post /Email

5.2 Complaint Processing

Unless otherwise prescribed by regulation, the following general guidelines should be followed regarding responses to complaints:

- Complaints should be acknowledged within two (2) days after receipt of the correspondence, oral, telephonic, or electronic notification of a complaint.
- Inquiries, comments, or objections should be answered or information provided within ten (10) business days after receipt.
- Complaints not involving an on-site investigation should be fully processed and responded to within ten (10) days after receipt.
- Complaints involving an on-site investigation should be resolved within twenty (20) days after receipt.
- Seek to gather and investigate all relevant evidence and information regarding the Complaint

- Communicate with Complainants clearly, in plain language that is easy to understand
- When an answer cannot be provided within the expected time frame of twenty (20) days, the CRO should inform the Complainant about the causes of the delay and indicate when its investigation is likely to be completed

5.3 Provision of information

- **5.3.1** Details of the procedure to be followed when handling a Complaint are made public by each Branch in an easily accessible manner, for example in brochures, contractual documents or via the website. Such details shall include information about the Complaints handling policy and the contact details of the Complaints management function.
- **5.3.2** This information shall also be provided to stakeholders on request, or when acknowledging a Complaint.
- **5.3.3** The information about the Complaints handling process must be clear, accurate and up-to-date, and include:
- Further details on how to complain (e.g. the type of information to be provided by the Complainant, the identity and contact details of the person or department to whom the Complaint should be directed);
- The process that will be followed when handling a Complaint, e.g. when the Complaint will be acknowledged, indicative handling timelines, the availability of the internal appeal procedure and a competent authority or alternative dispute resolution entities.
- **5.3.4** The Complainant shall be kept informed about further handling of the Complaint.

6. Responsibilities at the Management and Branch level

All management staff are responsible for handling complaints. Managers should always be prepared to receive and address complaints for resolution.

Branch managers are responsible for implementing this policy within their respective Operating Units. Each Operating Unit shall at least:

- Set up, publish and maintain a Complaints handling procedure
- Ensure that the Complaints handling procedure is available to all relevant co-workers through an adequate internal channel
- Send regular reports to the Manager-Marketing, Research and Communication

7. Key controls

Both at the Branch and Head office, the following must be in place:

- An officer shall be appointed as the complaints-handling coordinator
- A procedure on how Complaints are handled in detail within the Branch, in line with the principles set out in this policy, is available and clearly communicated
- A Complaints register in line with the requirements as set out in this policy
- A reporting structure in respect of Complaints:
- i) Internally, to
 - Manager, Marketing, Research and Communication
- ii) Externally, to
 - The regulator (BOG)

8. Training

Compulsory training shall be conducted annually to all front-end staff and other employees on consumer protection principles, consumer rights, and complaint handling

9. Sanction

Failure to Comply

Failure to comply with any of the provisions of this policy, whether willful or unintentional, will result in appropriate disciplinary action, including the possibility of termination of employment. Additionally, in some cases, violations may constitute a breach of Ghanaian laws, potentially leading to fines and/or prosecution for the employee.

CERTIFICATION AND APPROVAL

COMPLAINT HANDLING POLICY

1. Board Chairman	Date
2. Director	Date
3. Director	Date
4. C E.O	Date

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